

UNITED STATES DISTRICT COURT
DISTRICT OF MASSACHUSETTS

UNITED STATES OF AMERICA)	
)	
v.)	Criminal No. 04 CR 10314 RCL
)	
MANUEL E. PINALES, et al.)	
_____)	

GOVERNMENT'S MOTION TO EXCLUDE TIME FROM
SEPTEMBER 8, 2005 THROUGH AND INCLUDING NOVEMBER 8, 2006

The United States, with the assent of the defendants in the above captioned action, respectfully moves to exclude, in computing the time within which the trial of this matter shall commence under 18 U.S.C. §3161(c)(1), the time period from September 8, 2005, through and including November 8, 2006, the date of the next scheduled status conference. Status conferences were held in the above captioned case on December 14, 2005, February 3, 2006, April 13, 2006, May 31, 2006, July 12, 2006, and September 6, 2006. At each of these status conferences, continuances were granted to allow additional time for the provision of discovery and the review of said discovery by the defendants. At each of these conferences, the court excluded the time period until the next status date from the time within which the trial of this matter shall commence under 18 U.S.C. §3161(c)(1), and the defendants assented to said exclusion of time. Such continuances were necessary to allow the government to provide additional discovery to the defendants and to allow the defendants to review said materials. As such, these

continuances served the interests of justice and exclusion of this time period is appropriate under 18 U.S.C. §3161(h)(8)(A).

Wherefore, the government, with the assent of the defendants, requests the court to grant this motion, memorializing the exclusion of these time periods in the interests of justice.

Respectfully submitted,

MICHAEL J. SULLIVAN
United States Attorney

By: /s/ Maureen B. Hogan
Maureen B. Hogan
Assistant U.S. Attorney

Dated: September 6, 2006